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Counterproposal to RM-10352

In RM-10352 Jeff Briggs proposes to make a narrow mode and wideband mode split of the Amateur 160 meter band. This split would occur at 1.843 MHz and follow the standard FCC regulations for band segmentation.

I would like to amend the proposal to grandfather in existing wideband usage of below 1.843 MHz for 3 weekends of the year where existing sponsored operating events would be impacted. These weekends would be the weekends of the CQ WW SSB contest, the ARRL DX SSB contest and the CQ WW SSB 160 contest.

These contests are well established uses of the band and like the exemptions on 40 meters for use of SSB below 7.1 MHz for US Amateur stations operating outside the contiguous 48 states this would not negatively impact the 160 meter band.

The following facts back up my proposal.

- (1) These weekends greatly increase the number of SSB users of the band.
- (2) These weekends would allow US stations to contact on SSB Amateurs in other parts of the world whose allocations are below 1.843 MHz.
- (3) This would prevent the additional problems related to US Amateur stations trying to contact stations in other parts of the world would now be required to operate using split frequency techniques. Use of split frequency on 40 meters has caused numerous complaints to the FCC.
- (4) This would not impact narrow mode usage of 160 meters during the rest of the year. SSB would only be allowed during these contest periods. This is only 1.5% of the calendar year.
- (5) RM-10352 shows that SSB usage of 160 meters during SSB contests is increasing at a similar rate to CW usage.

Sincerely,

Patrick L Collins N8VW